

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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*In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation*

**Master File No. 1:00 – 1898  
MDL 1358 (VSB)**

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**This Document Relates to:**

*New Jersey Department of Environmental Protection, et al. v.  
Atlantic Richfield Co., et al., No. 1:08-CV-00312-VSB*

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**STIPULATION AND ~~PROPOSED~~ ORDER**

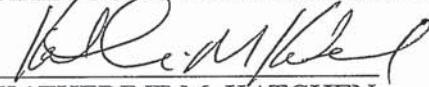
On or about September 28, 2018, the Court granted Plaintiffs' Unopposed Motion for  
Leave to File a Fifth Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, newly-added  
Defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil  
(collectively the "newly-added Lukoil Defendants"), and existing Defendants Lukoil Americas  
Corporation and Getty Petroleum Marketing Inc., that the newly-added Lukoil Defendants,  
Lukoil Americas Corporation and Getty Petroleum Marketing Inc. shall have until January 15,  
2019 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: November 29, 2018

AGREED TO BY:

AKIN GUMP STRAUSS HAUER & FELD LLP



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*Counsel for Newly-Added Lukoil Defendants*

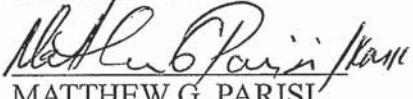
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*Counsel for Lukoil Americas Corporation & Getty Petroleum Marketing Inc.*

SO ORDERED,

Dated: November 30, 2018



Vernon S. Broderick  
United States District Judge